



Audubon Society
of Rhode Island



December 18, 2020

Luly E. Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 5088 - Renewable Energy Growth (RE Growth) Program Year 2021 submitted by the Rhode Island Distributed Generation Board's (DG Board) and the Narragansett Electric Co. d/b/a National Grid

Dear Ms. Massaro:

We strongly support the efforts by the RI Office of Energy Resources (OER) and the Distributed Generation Standard Contracts (DG) Board in collaboration with National Grid for the Renewable Energy Growth (REG) Program to continue the "carport adder" for the 2021 REG Program.

With 3 carport solar projects awarded in Cumberland, East Providence and Warwick in this first year, the pilot project has begun to demonstrate the opportunity for this incentive to encourage solar development in preferred siting areas like parking lots. We expect to see more uptake of the program in the coming year as solar companies and property owners have had more time to develop appropriate projects and municipalities gradually gain an understanding of these types of systems that are new to local planning and zoning boards.

As the State makes a push to achieve its clean energy goals to decarbonize the electric sector, it is essential that programs include the proper incentives to actively promote the siting of renewable energy projects on developed and disturbed areas, such as closed landfills, brownfields, and parking lots.

Our organizations appreciate the effort by the DG Board and OER to encourage renewable development in the built environment in this way and strongly support incentivizing solar parking lot canopies as one part of the solution to the solar siting challenge. Thank you for the opportunity to comment on the 2021 REG Program.

Sincerely,

Brian M. Daniels, Executive Director, Rhode Island League of Cities and Towns
Jeff C. Davis, President, American Planning Association, Rhode Island Chapter
Kai Salem, Policy Coordinator, Green Energy Consumers Alliance
Meg Kerr, Senior Director of Policy, Audubon Society of Rhode Island
Scott Millar, Director Community Assistance and Conservation, Grow Smart RI
Sheila Dormody, RI Director of Climate and Cities Programs, The Nature Conservancy
Topher Hamblett, Director of Advocacy, Save The Bay